**DEPARTMENT OF HEALTH AND HUMAN SERVICES**
FOOD AND DRUG ADMINISTRATION

| DISTRICT ADDRESS AND PHONE NUMBER | DATE(S) OF INSPECTION |
|---|---|
| 300 River Place, Suite 5900<br>Detroit, MI 48207<br>(313) 393-8100 Fax:(313) 393-8139<br>Industry Information: www.fda.gov/oc/industry | 12/11/2008 - 12/22/2008<br>FEI NUMBER<br>3006389940 |

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

**TO:** Akin-Remi Ajac-Ayodele, Director, Quality, Special Projects

| FIRM NAME | STREET ADDRESS |
|---|---|
| Caraco Pharmaceutical Laboratories, LTD. | 24700 Crestview Ct |
| CITY, STATE, ZIP CODE, COUNTRY | TYPE ESTABLISHMENT INSPECTED |
| Farmington Hills, MI 48335-1506 | Caraco Pharmaceutical Laboratories, LTD |

This document lists observations made by the FDA representative(s) during the inspection of your facility. They are inspectional observations, and do not represent a final Agency determination regarding your compliance. If you have an objection regarding an observation, or have implemented, or plan to implement, corrective action in response to an observation, you may discuss the objection or action with the FDA representative(s) during the inspection or submit this information to FDA at the address above. If you have any questions, please contact FDA at the phone number and address above.

**DURING AN INSPECTION OF YOUR FIRM WE OBSERVED:**

## OBSERVATION 1

Inspection of the packaging facilities immediately before use is not done to assure that all drug products have been removed from previous operations.

There have been numerous instances, 5/2008 through the present, where the failure to perform an adequate cleaning procedure ((b) (4) has resulted in the necessity to conduct (b) (4) inspection of packaged finished product lots for the presence of foreign tablets noted to be present in/on/near the packaging equipment after Quality Assurance release of the equipment/room for use. Examples include:

a. Meloxicam Tablet lot [redacted] inspected under SPO [redacted] dated 5/1/08 for the presence of Carvedilol 25 mg
b. Metformin HCl Tablet lot [redacted] inspected under SPO (b) (4) dated 8/7/08 for the presence of Mirtazapine 45 mg
c. Metformin HCl Tablet lot [redacted] inspected under SPO (b) (4) dated 8/21/08 for the presence of Metropolol Tartrate 100 mg
d. Tramadol HCl tablet lot [redacted] inspected under SPO (b) (4) dated 8/24/08 for the presence of Metoprolol Tartrate 50 mg tablets
e. Methimazole Tablets lot [redacted] inspected under SPO # (b) (4) dated 9/6/08 for the presence of Clonazepam 0.5 mg tablets
f. Metformin HCl tablet lot [redacted] inspected under SPO (b) (4) dated 10/20/08 for the presence of Metoprolol Tartrate 100 mg tablets
g. Tramadol HCl Tablets lot [redacted] inspected under SPO (b) (4) dated 11/3/08 for the presence of Atenolol Tablets 25 mg
h. Zolpidem Tartrate Tablets lot [redacted] inspected under SOP (b) (4) dated 11/18/08 for the presence of Carbamazepine Tablets 100 mg
i. Metformin HCl Tablets lot [redacted] inspected under SPO # (b) (4) dated 12/2/08 for the presence of Metropolol Tartrate 100 mg

| SEE REVERSE OF THIS PAGE | EMPLOYEE(S) SIGNATURE | DATE ISSUED |
|---|---|---|
| | Patsy J Domingo, Investigator<br>Jonathan R. Loving, Investigator<br>Adam J. Wilson, Investigator | 12/22/2008 |

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## OBSERVATION 2

The responsibilities and procedures applicable to the quality control unit are not fully followed.

SOP (b) (4) "(b) (4) ". Section (b) (4) of this SOP calls for "(b) (4) ". It was determined that there has been no trending of SPO's issued for 2008, although (b) (4) SPO's have been issued in 2008 as of the start of this inspection. The following is a partial summary of the reasons for SPO issuance for 2008 as listed in the database provided:

| | |
|---|---|
| Foreign Tablets | (b) (4) instances ((b) (4) since May 2008) |
| Thick/Thin Tablets | (b) (4) instances ((b) (4) Thick) - (b) of which were for Clonazepam |
| Foreign Contamination | (b) (4) instances ((b) (4) since September) |
| Inspection of (b) (4) " lots from (b) (4) | (b) (4) instances |
| Inspection of " (b) (4) " lots from (b) (4) | (b) instances |
| Inspection (non discript) | (b) (4) instances (b) (4) since 6/27/08) |

## OBSERVATION 3

Batch production and control records do not include complete information relating to the production and control of each batch.

a. On 12/11/08 we observed a problem that occurred during packaging of Zolpidem Tartrate Tablet lot (b) (4) where, due to an alignment issue bottles were shorted tablets as the tablets were observed to be spilling onto the floor. The line had to be stopped, adjustments made, and bottles removed and their contents dumped. Review of the packaging record following the completion of the run revealed no notation of the problems we witnessed.

b. Review of the batch record for Zolpidem Tartrate Tablet lot (b) (4) reveals no indication of a problem during packaging. However, review of Caraco's complaint data base reveals there have been (b) (4) complaints of incorrect tablet count received for lot 80311A.

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## OBSERVATION 4

The persons performing and double-checking the cleaning and maintenance are not dating and signing or initialing the equipment cleaning and use log.

a. On 12/12/08, review of the Line [redacted] Maintenance Use and Cleaning Record noted the clean-up of this area, last used 12/11/08, was not documented on this log or on the Cleaning and Washroom Area log where "(b) (4) cleaning of the various rooms are documented. The area referred to as Line F was clean with no sign of "inspection" activities for the lot of Metformin, (b) (4) , that was inprocess on 12/8-11/08. Inspection of Lot (b) (4) was not complete.

b. Failure to document (b) (4) cleaning between packaging of Atenolol Tablet lot (b) (4) and Tramadol HCl tablet lot (b) (4) both packaged on Line [redacted] on 10/31/08. Tramadol lot (b) (4) was ultimately inspected for the presence of Atenolol following the discovery of Atenolol Tablet(s) in the packaging room after packaging the Tramadol lot.

## OBSERVATION 5

Written records of major equipment cleaning, maintenance, and use are not included in individual equipment logs.

Induction sealer, Caraco asset # (b) (4), located in "Line [redacted]" area does not have a usage log. This moveable equipment was utilized for unsealing and sealing finished product containers subjected to inspection for various reasons as assigned by the Quality Unit via a Special Processing Operation (SPO) order.

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